

Response Deadline November 11, 2006
4:00 pm EST
Hearing Date and Time: November 30, 2006
10:00 am EST

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

DELPHI CORP. *et al.*,

Debtors.

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)
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)

Chapter 11

Case No. 05-44481 (RDD)

(Jointly Administered)

**NOTICE OF MOTION OF FORMER EMPLOYEES'
FOR LIMITED RELIEF FROM THE AUTOMATIC STAY,
TO THE EXTENT APPLICABLE, TO PAY AND/OR ADVANCE
DEFENSE COSTS UNDER THE DEBTORS' INSURANCE POLICIES**

PLEASE TAKE NOTICE that J.T. Battenburg III, Alan S. Dawes, Paul R. Free, John G. Blahnik, Milan Belans, Catherine Rozanski, Pamela Geller, Peter Janak and Laura Marion (collectively "Movants") have filed a motion (the "Motion") For Limited Relief From The Automatic Stay To Pay And/Or Advance Defense Costs Under The Debtors' Insurance Policies.

PLEASE TAKE FURTHER NOTICE that a hearing (the "Hearing") will be held in connection with the entry of an Order granting the relief requested in Movants' Motion and any further relief on **November 30, 2006 at 10:00 am, prevailing Eastern Time**, before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York (the "Court"), Alexander Hamilton Custom House, Room 610, One Bowling Green, New York, NY 10004.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to Movants' Motion shall be in writing, shall state with particularity the reasons for the objection or response, and shall be filed with the Court and shall be served upon counsel for Movants as listed

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below, so as to be *received* by **November 11, 2006 at 4 p.m.** Only those objections which have been timely filed and served may be considered by the Court at the hearing.

Dated: New York, New York
October 18, 2006

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, ROBERT M. STERN, certify that I caused true and correct copies of the foregoing Notice Of Motion Of Former Employees' For Limited Relief From The Automatic Stay, To The Extent Applicable, To Pay And/Or Advance Defense Costs Under The Debtors' Insurance Policies to be served on all counsel on Exhibit A by electronic mail and all counsel on Exhibit B by First Class Mail this 19th day of October 2006.

/s/

Robert M. Stern

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